



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

DENVER, COLORADO 80202-2405

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Ref: 8RC

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Site East Helena
File # 1.02.02.00
Confidential: Yes ☐ No ☒
Admin. Record: Yes ☒ No ☐
Key Words/Comments: PRP search:
Followup requests for
info from American Chemet

Law Offices of Rooks, Pitts and Poust
Xerox Centre
Suite 1500
55 West Monroe Street
Chicago, Illinois 60603
For: American Chemet Co.

Re: Information Request
Concerning East Helena
CERCLA Site

Dear Mr. Lake:

The United States Environmental Protection Agency, Region VIII ("EPA") has carefully reviewed your submittals of March 24 and June 9, 1987 in response to the initial request for information of February 23, 1987. EPA finds the record you submitted incomplete and is now seeking to obtain additional information and documents from you concerning the identification, nature, and quantity of materials which have been generated, treated, stored, or disposed at or transported to your East Helena plant. The purpose of this information request is to identify fully the nature and volume of the materials handled at the East Helena CERCLA site, the nature and extent of the releases from each of the operations at the site so as to arrive at an equitable apportioning of responsibility among the Potentially Responsible Parties (the "PRPs") for the site under CERCLA.

EPA is trying to construct a database of materials and processes pertaining to the industrial activities that took place and are taking place at the site. For the data base to be complete and accurate, EPA needs complete records of your industrial operations at East Helena. Where records do not exist or are missing you are asked to provide your best estimate. In order to assist you in preparing your response, EPA has identified a set of questions that reflect the requirements of the database. Some questions were generated from review of your previous submittal and there maybe overlaps in the information requested.

1) Please clarify the following points that were mentioned in your letter of response of March 24, 1987:

a) What was the temperature of incineration in the rotary kiln you installed in 1949?

b) What was the efficiency of dust collection in the baghouses?

c) Provide chronologically the yearly quantities of zinc fume repackaged from 1947 to 1984.

d) What was the source of the supply of the byproduct zinc oxide which was used as raw material in the production of "Zinox"? What was the average lead content of the raw material? Identify the quantity, and percent of each constituent that make up the waste (if any) from this operation.

e) What is the efficiency of the dust collection system in the "Zinox" operation?

2) For each material that you generated, received, or stored (including, but not limited to raw materials, finished products, by products, waste, fuel) at the East Helena CERCLA site:

a) Identify the generic and chemical name

b) For each material identified, state the nature of the material identified, state the nature of the material (i.e., liquid, semisolid, solid, other (describe)),

c) List the chemical constituents that make up each of the identified material, and state the average concentration and concentration range for the constituents listed. Provide any available records of assay or analytical results.

3) Give annual data chronologically for the period from 1947 to present:

a) The quantity of each material identified in response to question 2.

b) For each material identified, the source of the supply, mode of transport, and containment method.

4) Provide all records of purchase and shipments of zinc fume and zinc dross bought from Anaconda as per purchase/sales agreement between American Chemet Corp. and Anaconda for the period from 1947 to 1971.

5) Submit any records, if available of annual primary and fugitive emissions from your operations. If no measurements were taken or records kept of emissions, give your best estimates for the period you had been operating.

6) Please provide a map outlining the site of the American Chemet Corporation's operations at the East Helena CERCLA site.

7) Submit process flow sheets (including structures such as kiln, furnace, dryer, coolers, etc.) for the following operations:

- a) Zinc fume packaging
- b) Talc Operations
- c) Copper Oxide Production
- d) Zinc dross roasting operations
- e) Zinox operations
- f) American Chemet Corp.

Please review the questions that follow thoroughly and provide the information and supporting documentation requested within two weeks of the date of receipt of this letter. If you have any questions concerning this request, please contact Sandra R. Moreno at (303) 293-1458, at the Denver office, or D. Scott Brown at the E. Helena office (406) 585-5414.

Sincerely,


Diana Shannon, Chief
Superfund Remedial Branch

cc: S. Moreno, 8RC
✓ S. Brown, 8MO
J. Wardell, 8MO
J. Desautels, ARCO
B. Lawrence, Marcel, Pauro, Hultin & Spannstra
Sato, Inc.